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DEPARTMENT OF NATURAL RESOURCES

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January 31, 2018

Jaren Jorgensen
Castle Valley Mining, LLC
P.O. Box 475
Huntington, Utah 84528

Subject: Plate 2-2B, Castle Valley Mining, LLC, Bear Canyon Mine, C/015/0025, Task #5571

Dear Mr. Jorgensen:

The Division has reviewed your application. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application by no later than February 28, 2018.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
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Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0150025
TaskID: 5571
Mine Name: BEAR CANYON MINE
Title: PLATE 2-2B

Summary

The removal of the topsoil for the access road was reviewed and approved with Task 5109, May 3, 2017. The as-built map was included with Task 5209 in June 2016, to which an engineer and hydrologist were assigned the review. Upon review of the Annual Report by the Soil Scientist, it was clear that the as-built Dwg 2-2B, WHR Topsoil Stockpile, was incorrect.

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Operation Plan

Topsoil and Subsoil

Analysis:

The application does not meet the requirements of R645-301-231.400, because the outline of the Wild Horse Ridge topsoil pile in plan view on Plate 2-2B may not capture the entire West end of the pile, and the contour intervals within the topsoil polygon are not identified, and the extent of the topsoil pile should be indicated on the cross-section lines.

Two 10 ft. contour lines end abruptly (elevation 7,270 and 7,255 ft). At least one of the 10 foot contour lines within the topsoil pile polygon must be identified, because the contours do not match those outside of the polygon. This is due to the fact that only the contours of the topsoil pile were resurveyed for the as-built (personal communication with J. Jorgensen on 1/23/2018).

Plate 2-2B was revised, because the topsoil pile configuration was affected by construction of the #2 Belt Access road to the catch basin beneath the conveyor belt. During the #2 Belt construction topsoil was removed from the 7,228 - 7,240 ft elevation of the South toe and placed back on the top and North side of the pile, along the Lower Conveyor Belt Access Road. No topsoil was lost. However, the West boundary of the stockpile was changed. This boundary was unaffected by the access road.

During this resurvey of the WHR topsoil stockpile, the total volume of soil stored is reported as 3,900 CY. The previously reported volume of the pile was 8,900 CY. (Both the 2005 and revised versions of Plate 2-2B identify an additional 2,354 CY stored in situ below the stockpile for reclamation.)

The MRP states that 1,200 CY was moved to the WHR stockpile from the showerhouse pad topsoil pile and 1,000 CY was moved to this stockpile from the Tank Seam access road. Since those stockpiles have been moved, that means that the WHR stockpile holds only 1,700 CY salvaged from the construction of the Wild Horse Ridge. This loss of available topsoil has implications for the reclamation plan that will need to be addressed under another amendment to the MRP.

Marker strips were described as being laid down before pile construction (MRP Section R645-301-231.400). No marker strips were encountered during topsoil removal in construction of the #2 Belt Access (JJorgensen, personal communication, 1/23/2018). Either the strips weren't laid down as described or there could be topsoil beneath the #2 Belt Access Road.

The Division requests confirmation of the topo lines from the stream channel and catch basin, including the #2 Belt Access Road, all the way up to the top of the pile in the as-built.

Deficiencies Details:

The application does not meet the R645-301-231.400 requirements. The following deficiency must be addressed prior to final approval:

R645-301-231.400, Include and identify topographic lines from the stream channel and catchbasin, to the top of the pile. Identify the contour intervals within the topsoil polygon. Capture the outline of the entire topsoil pile in plan view, including the West toe. Identify the extents of the pile on the cross-sections.

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